

MEMO ENDORSED



THE CITY OF NEW YORK
LAW DEPARTMENT
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March 1, 2021

Via ECF

The Honorable Katherine Polk Failla
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

Re: M.T., et al. v. N.Y.C. Dep't of Educ., Case No. 20 CV 7544 (KPF)

Dear Judge Failla:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, James E. Johnson, attorney for the Defendants New York City Department of Education, New York City Board of Education, and Chancellor Richard Carranza (collectively, "DOE") in the above-referenced action. I write, jointly with Plaintiffs' counsel, to respectfully request an 11-day extension of the parties' deadline to provide the Court with a status report.

The parties request this extension because Plaintiffs have provided DOE with a proposed stipulation of settlement that the DOE has been reviewing with its counsel, and the parties intend to hold a meet-and-confer this week to further discuss the terms of this proposed stipulation. Additionally, Plaintiffs have raised certain matters, some pertaining to a recently drafted Individualized Educational Plan for the Plaintiff-Student that will also be discussed at this meet-and-confer. The parties hope that, with the benefit of an additional eleven days, the discussions at this meet-and-confer can be reflected in the status letter. Lastly, an 11-day extension will also accommodate intervening professional responsibilities in another matter on which Plaintiffs' and Defendants' counsel are working.

This is the parties' first request for an extension of time by which to submit the status letter. The present deadline for the parties to submit their status letter is today, March 1, 2021. The requested 11-day extension would move this deadline to March 12, 2021.

The parties thank the Court for its consideration of this request.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer

cc: ***Via ECF***
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Application GRANTED.

Dated: March 2, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE